

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

BILLJCO, LLC,

*Plaintiff,*

v.

CISCO SYSTEMS, INC.,

*Defendant.*

CASE NO: 2:21-cv-00181-JRG  
(Lead Case)

BILLJCO, LLC,

*Plaintiff,*

v.

HEWLETT PACKARD ENTERPRISE  
COMPANY, ARUBA NETWORKS, LLC,  
*Defendant.*

CASE NO: 2:21-cv-00183-JRG  
(Member Case)

**JOINT MOTION TO EXTEND THE STAY**

Plaintiff BillJCo, LLC and Defendants Hewlett Packard Enterprise Company and Aruba Networks, LLC (together, the “Parties”) jointly request an extension of the 30-day stay entered by the Court on June 17, 2022. See Dkt. No. 201. The parties seek an extension of 30 days.

On June 15, 2022, the Parties filed a Joint Motion to Stay and Notice of Settlement. See Dkt. No. 199. The Parties informed the Court that they are in the process of memorializing a long-form settlement agreement. At the time, the Parties anticipated that they would be able to submit formal dismissal papers within thirty (30) days.

The Parties file the present joint motion to respectfully request an extension of the stay of all deadlines for an additional thirty (30) days. While the Parties have spent extensive time negotiating the long-form agreement, they are very close and still discussing a couple final terms.

Once the parties finalize the agreement, additional time is needed to procure the necessary signatures and file the dismissal papers.

Accordingly, for this reason, the Parties respectfully request a 30-day extension of the stay. This joint motion is not filed for purposes of delay, but so that justice may be served in the most efficient manner and without wasting judicial or party resources.

Dated: July 15, 2022

Respectfully submitted,

/s/ Brian R. Michalek by permission Andrea Fair

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**Attorneys for Defendants  
Hewlett Packard Enterprise Company and  
Aruba Networks, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this the 15th day of July, 2022

/s/ Andrea Fair  
Andrea Fair

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Plaintiff and counsel for Defendants have complied with Local Rule CV-7(h) by conferring, and all parties agree to filing this as a joint motion.

/s/ Andrea Fair  
Andrea Fair